

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

UNITED STATES and STATE OF TEXAS
ex rel. DANIEL W. ELLIOTT, M.D. and
LISA A. MINSLOFF, M.D.,

Plaintiffs,

v.

Case No. 1:23-cv-00329-MJT

SOUTHEAST TEXAS MEDICAL
ASSOCIATES, LLP; STEWARD HEALTH
CARE SYSTEM; ONPOINT LAB, L.L.C.;
BAPTIST HOSPITALS OF SOUTHEAST
TEXAS; MUHAMMAD AZIZ, M.D.;
JAMES HOLLY, M.D.; MARY CASTRO,
M.D.; VIJAY KUMAR, M.D.; MICHAEL
THOMAS, M.D.; SYED ANWAR, M.D.;
CAESAR DEIPARINE, M.D.; RONALD
PALANG, M.D.; ABSAR QURESHI, M.D.;
DEAN HALBERT, M.D.; and WILLIAM
GEORGE, M.D.,

Defendants.

NOTICE OF SERVICE OF SUPPLEMENTAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26 and paragraph 2 of the Order Setting Civil Action for Rule 16 Management Conference (Dkt. No. 95), Defendants Southeast Texas Medical Associates, LLP, Dr. Muhammad Aziz, Dr. Vijay Kumar, Dr. Mary Castro, Dr. Michael Thomas, Dr. Syed Anwar, Dr. Ronald Palang, Dr. Absar Qureshi, Dr. Dean Halbert, and Dr. Caesar Deiparine (collectively “Defendants”) give notice that on August 21, 2023, Defendants served Initial Disclosures on all counsel of record as required by the Court Order in place at that time. On October 4, 2023, Defendants served Supplemental Disclosures, adding additional persons with

knowledge of relevant facts, producing relevant documents, and offering to make available multiple bankers boxes of additional relevant documents. Defendants further give notice that on October 17, 2023, Defendants supplemented its production of documents in this matter.

Dated: October 17, 2023

Respectfully Submitted,

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PALANG, M.D.; ABSAR QURESHI,
M.D.; and DEAN HALBERT, M.D.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all parties that have appeared through the Court's electronic filing system on October 17, 2023.

/s/ David W. Klaudt
David W. Klaudt